

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
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UNITED STATES)

v.)

DOMINGA RODRIGUEZ)

Defendant)

CR. NO. 04-10170-GAO

2004 OCT 26 A 11:15

U.S. DISTRICT COURT
DISTRICT OF MASS.

MOTION TO ENLARGE TIME TO
FILE MOTION TO SUPPRESS

Now comes the Defendant, Dominga Rodriguez, through Counsel, and Moves this Honorable Court to enlarge the time for filing Defendant's Motion to Suppress an additional 60 days. In support of this motion, counsel states:

1. There is an inconsistency between the date the Immigration Judge indicates that Defendant received her Lawful Permanent Resident Status, and the date indicated on documents submitted by the government from the former Immigration and Naturalization Service.
2. The date on which Defendant became a Lawful Permanent Resident is crucial to Counsel's Motion to Suppress.
3. Counsel requires additional discovery from the government regarding the exact date on which defendant became a Lawful Permanent Resident.

Accordingly, Counsel respectfully Moves this Honorable Court to grant an additional 60 days to in order that the Defendant may obtain documentation as to her Lawful Permanent Resident status start date.

Respectfully Submitted,
Dominga Rodriguez
the Defendant
By her Attorney

Date: 10/25/04




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CERTIFICATE OF SERVICE

I, Stephen A. Lagana, Counsel for the Defendant, hereby certify that on this date I have mailed, by first class mail, a copy of the enclosed Motion to Enlarge Time to:

Michael J. Sullivan, Esq.
Christopher F. Bator, Esq.
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210



Stephen A. Lagana, Esq.

10/25/04

Date